

Rossander, Harry V

From: Scott Witte <switte@hopehaven.org>
Sent: Tuesday, February 23, 2016 1:44 PM
To: Policy Analysis
Subject: Public Comment - Empl. Redesign - HH (2-23-16)
Attachments: Public Comment - Empl. Redesign - HH (2-23-16).pdf

Dear Mr. Rossander:

Attached is a document containing Hope Haven, Inc's public comments regarding the Amended Notice of Intended Action which spells out Iowa Department of Human Service's proposed amendments for Supported Employment Services provided through HCBS Waiver and HCBS Habilitation. Thank you for the opportunity to provide comments to these proposed rules.

I would appreciate it if you could acknowledge receipt of my email and are able to open the attachment. Please feel free to contact me with any questions you might have. Thank you.

To: Harry Rossander
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Department of Human Services
Hoover State Office Building, 5th Floor
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From: Scott Witte, Director of Partnership & Service Development
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Re: Public Comments on the Amended Notice of Intended Action: Supported Employment Rules

Date: 2-23-2016

I am writing to comment on the "Notice of Intended Action: Supported Employment Rules amendments."

Strengths of the Proposed Supported Employment Rules Amendments

Hope Haven, Inc. was involved as a member of the statewide Iowa Employment Services Redesign workgroup back in the Summer and Fall of 2013. We are pleased that the state is moving ahead with a significant rules modification which promotes and supports an increase in access to and usage of integrated employment services for persons with disabilities in Iowa. It will also more adequately fund provision of those services, presenting greater opportunity for service providers to offer and build capacity to provide integrated employment services. We appreciate that DHS is seeking comment on the rules that were amended following the public comment held in September 2015, as there remain some specifics in the amended rules that would unduly burden many providers – especially those in rural settings – and thus reduce the success that HCBS Waiver and Habilitation Services members may experience in seeking integrated, competitive employment through supported employment services.

There are many positives in the amended noticed rules from our perspective as a provider. To briefly highlight several of these points:

- This package represents a move forward in promoting the provision of integrated employment services in Iowa! This aligns with the efforts of DHS, IVRS, Employment First, and the Iowa Coalition for Integrated Employment over the past several years, and is consistent with the nation-wide demand for employment services that are provided in integrated, competitive settings.
- Rates for employment services are built from staff costs. Significant progress is being made in funding of individual supported employment services provided by both

professional (Employment Specialist) and para-professional (Long Term Job Coach) staff.

- Tiered system for individual site, long term job coaching appear to be reasonable from our agency's standpoint.
- Individual service authorizations will be based upon level of need.
- Consumer transportation funded separately.
- Time that staff provides "on behalf of" the consumer is billable.

Concerns and Recommendations to Strengthen the Rules:

The following comments are made following the order of the "Amended Notice of Intended Action" document:

78.27(9)a(1) and 78.27(9)a(2)2: Two comments here:

1. "Career Exploration" is a critical component of a successful Discovery process that leads to a well thought out career plan and, ultimately, a successful job match in integrated, competitive employment. The HCBS Waiver and Habilitation Services members who engage in this phase of service will best be served by professional level staff who provide services under "Individual Supported Employment" (i.e. employment specialists, job developers, etc.); facilitating a service planning team and crafting a "career plan" is a professional-level service. To deliver "Career Exploration" with Pre-Vocational staff members (the lowest level of staff requirements from an education, experience, and training standpoint in the amended rules) would be detrimental to the HCBS Waiver and Habilitation Services members engaging in "Career Exploration", and potentially hinder their successful placement. It is our agency's experience that individuals engaged in activities similar to those described in "Career Exploration" services actually benefit from doing parts or all of this service in small groups of 2 – 5 individuals.

Recommend – Alternative #1: "Career Exploration" be required to be provided by or under the direction of professional staff who meet qualification as described for "Individual Supported Employment" under 77.25(9)c(1), 77.37(16)d(1), and 77.39(15)(1). As such, "Career Exploration" be funded at the "Individual Supported Employment" level on the fee schedule; Or,

Recommend – Alternative #2: Provide language in the rule that allows "Career Exploration" services to be provided in small groups of up to four (4) individuals. If this language were to be adopted, but not the language as recommended immediately above in Alternative #1., it would at least allow agencies the latitude to provide part or all of this service with professional level staff.

2. An important and useful part of Career Exploration (also known as Discovery) is often a Workplace Readiness Assessment conducted in the community at one or more work sites in businesses or industries that are integrated. The purpose is to assist the job candidate in determining vocational options, direction, goals and training strategies. The CRP arranges for the evaluation to occur at a business that is representative of the type of work agreed upon; the CRP and employer provide the training, assessment, and supervision at the worksite; the individuals with disabilities work alongside non-disabled individuals; the job candidate learns the positives and negatives of the community work site and expresses those to the team; the job candidate better defines employment interests for future programming; the CRP works with the employer to identify customized employment options; and the CRP and the employer assess the job candidate's strengths and needs relative to those of a competitive worker and document the results.

Recommend: Add "Workplace Readiness Assessment" as one of the activities that may be provided as a part of Career Exploration.

78.27(10)a(4): In rural Iowa, supported employment providers' staff members are often traveling 15 - 45 miles (30 to 90 miles round trip), with 15 minutes to 2 hours on the road to conduct integrated employment activities such as those described under amended rule "Individual Supported Employment" on behalf of a job seeker. Given this fact, there is a significant inequity that exists between rural and metro service providers. Obviously, this is a significant additional cost for providing individual supported employment in rural Iowa; this puts rural providers in undue financial peril (unsustainable), and consumers seeking employment at a disadvantage as compared to their peers in city/urban areas.

Recommend – Alternative #1: Add an item to the list of allowed individual employment strategies:

"21. Travel time for staff member providing individual supported employment on behalf of the job seeker." In addition, allow for the possibility for exception to exceed cap of 240 units of service per year if rural transportation hours can be proven to be an excessive drain on the time spent per individual. Or,

Recommend – Alternative #2: As an alternative to #1 immediately above, add hours for non-billable time (recommend 10 per week) and number of miles (Recommend 10,000/year to be used in the rate model used to set rates for individual placement and support (our agency's actual based upon Feb- July '15 data was 10,600 miles per Employment Specialist)).

78.27(10)a(4): As Iowa transitions to increased integrated community employment, much time will need to be spent in recruiting and educating Iowa employers.

Recommend: In the rate setting model used to set rates for individual placement and support, additional hours for “non-billable job development” are necessary as we are building capacity in Iowa’s business and industry employer base (recommend at least 5 hours per week).

78.27(10)b(4): In rural Iowa, providers may travel 15 - 45 miles (30 to 90 miles round trip), with 15 minutes to 2 hours on the road to conduct long term job coaching activities on behalf of a job seeker. Given this fact, there is a significant inequity that exists between rural and metro service providers. Obviously, this is a significant additional cost for providing long term job coaching in rural Iowa; this puts rural providers in undue financial peril (unsustainable), and consumers seeking employment at a disadvantage as compared to their peers in city/urban areas.

Recommend – Alternative #1: Add an item to the list of allowed individual employment strategies:

“15. Travel time for staff member providing long term job coaching on behalf of the person receiving long term job coaching services.” Or,

Recommend – Alternative #2: As an alternative to #1 immediately above, add hours for non-billable time (recommend 8 per week) and number of miles (Recommend 8,000/yr be used in the rate model) to the “rate model” used to set rates for individual placement and support.

78.27(10)e(3): *In rural Iowa, much time may be spent on travel in job development activities.*

Recommend: Allow for the possibility for exception to exceed cap of 240 units of service per year if rural transportation hours can be proven to be an excessive drain on the time spent per individual.

ITEMs 14 & 15:

Fee Schedule & Rates comments: Please note that these comments and recommendation apply to both Items 14 and 15.

Individual Supported Employment: See notes above under 78.27(10)a(4).

Long Term Job Coaching: See notes above under 78.27(10)b(4). In addition, we recommend the following to strengthen the model:

Recommend: Adjustment tiers as follows:

- *Tier 0 / Tier 1: Under 2 hrs per month may well be **multiple** job coaching contacts per month, it cannot be assumed under 2 hours will be “one contact.” Two possible suggestions to manage this: 1) Leave the Tier as is, but apply a “2.0 factor” rather than the proposed “1.5” – this then would also create more incentive to move to under 2*

hours per month (preferred); or 2) Change the low end of Tier 1 to 1hr per month rather than 2 hrs per month.

Small Group Supported Employment: I understand that we do not want G.S.E. to become the outcome placement for people, that I.S.E. is to be the goal. However, the rate structure for providing G.S.E. could certainly be incentivized. At proposed rates, it is a cut for providers. G.S.E. is integrated and can serve for some – especially those with more significant support needs – as a stepping stone into community work settings and then from there into I.S.E. for some (hopefully, many!)

As the state and its providers transition to increased services in community based settings: 1) G.S.E. should be viewed as a positive, desirable service setting, not a bad, undesirable setting. 2) Rates for G.S.E. need to reflect that it is at least as – preferably more – desirable than facility based employment. Rates should not be reduced beyond current. 3) Rates should be tiered based upon group size to reflect the value that the smaller the employment group size, the better opportunity to integrate in the Employer's work setting. 4) We should keep in mind a recent Iowa ODEP Subject Matter Expert for "Organizational Transformation", Nancy Gurney's company 100% of those served are in integrated employment – 60% in ISE, but 40% are in G.S.E. – When asked about that, she indicated that without G.S.E. many of those folks would simply not be employed.

We need to incentivize G.S.E. provided in smaller group sizes. The amended tiered structure does not incentivize within tiers the smaller group size; it actually disincentivizes the smaller group size within the tiers: With all this as a backdrop:

Recommend: A three-tiered method of funding group supported employment that would look something similar to the following example:

- *Group of 2-3 Workers: \$14.80/hour x 3 = \$44.40 per group (not per individual)*
- *Group of 4-6 Workers: \$7.25/hour x 6 = \$43.50 per group (not per individual)*
- *Group of 7-8 Workers: \$5.31/hour x 8 = \$42.48 per group (not per individual)*

83.82(1)p(4): I believe there may be a typo in the language. Should the term "small group supported employment" be replaced with "prevocational"?

Recommend: Replace the term "small group supported employment" with "prevocational."